

2nd Amendment

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Jesse Daniel Roberts
Tamara Lashar Roberts

Plaintiff(s),

v. Amendment to list

Samantha Franko

Defendant(s)

Case Number

2:24-CV-00052

Judge

Waverly D. Crenshaw

Magistrate Judge

Park West Med4 Amendment

Case 42 1983

Injunctive & Damages

(Type of Pleading)

* Defendant Samantha Franko DC's 2600 Western Ave Knoxville TN 37921

On November 21, 2022 Samantha Franko did in fact violate Jesse Roberts, Tamara Roberts, and Trayton Roberts clearly established rights, 4th, 14th & 8th amendments to the United States Constitution. Samantha Franko acting under color of the law became a willing participant in this conspiracy on 11/21/2022 where as her conduct was that of a leader organizer to deprive these parents of their clearly established rights to have control and custody of their New Born child Trayton D. Roberts. She took part in

the kidnapping of T.O.R. all acting under color of the law. She violates the aforementioned 14th Amendment right to due process, and moreover, violates Jesse Roberts 4th amendment rights against illegal search & seizure & clearly established right.

Jean Zeland
Tamarah Roberts

Park West Medical Center
9852 Park West Blvd
Knoxville TN 37923
PM (865) 373-1000

On November 21, 2022 Park West Medical Center deprives Jesse David Roberts & Tamarah Kasha Roberts in addition Traeger O. Roberts of their clearly established 4th & 14th Amendment right by entering into this conspiracy against these parent willingly that deprives parent of their clearly established rights to have control & custody of their child.

Jean Zeland
Tamarah Roberts

(Signature)

Tamara Roberts

(Print Name)

Seese D. Roberts

Tamara L. Roberts

510 Country Wood Lane

(Address & Telephone Number, if any)

Gainesboro TN 38562

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